

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION**

UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	CASE NO. 3:16 CR 166
	:	
vs.	:	JUDGE CARR
	:	
PABLO DURAN RAMIREZ, aka PABLO	:	
DURAN, SR.,	:	
Defendant.	:	

MOTION TO CONTINUE

Defendant Pablo Duran, Sr., through undersigned counsel, respectfully moves this Court to modify the briefing schedule and continue the sentencing hearing scheduled for September 23, 2019. The Government is not opposed to this Motion to Continue. The reasons in support of Defendant's request are set forth in the attached Memorandum.

Respectfully submitted,
Taft Stettinius & Hollister LLP

/s/ **David H. Thomas**
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Counsel for Defendant

MEMORANDUM

Defendant Pablo Duran Ramirez, through undersigned counsel, is now before this Court requesting a modification of the briefing schedule and a continuance of the sentencing hearing scheduled for September 23, 2019. Undersigned counsel is mindful that this matter has been scheduled for many months. However, several events have made it extremely difficult to prepare for sentencing. First, the investigation requested by the Court has been more complicated than anticipated and is ongoing as it relates to Defendant's property interests in Mexico and his financial participation in the instant case. Second, undersigned counsel suffered some health issues during the summer that further delayed preparation for a period of time. While counsel was able to work, productivity suffered. Third, undersigned counsel recently completed a weeklong jury trial and was earlier involved in overseas travel for a case that was more time-consuming than anticipated.

This request is not made to needlessly delay resolution of Mr. Duran's case. However, given the importance and complexity of the matters involved in this case, and in order to guarantee counsel provide effective representation to Defendant, it is respectfully requested that the Court grant the instant Motion to Continue.

Respectfully submitted,
Taft Stettinius & Hollister LLP

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing was filed with the Clerk of Court for the United States District Court for the Northern District of Ohio using the CM/ECF system, which will send notification of such filing to Assistant U.S. Attorney Chelsea Rice, 801 West Superior Avenue, Suite 400, Cleveland, Ohio 44113, and Dana Mulhauser, U.S. Department of Justice, PHB 5130, 950 Pennsylvania Avenue, Washington, DC 20530 on September 12, 2019, by electronic mail.

/s/ David H. Thomas
DAVID H. THOMAS

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